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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT**

EPA Region 5 Records Ctr.



267984

I. HEADING**DATE:** August 23, 2001**SUBJECT:** POLREP for the Dayton X-Ray Site, Dayton, Montgomery County, Ohio**FROM:** Steve Remminger, U.S. EPA OSC, Region 5, ERB, RS1, Cincinnati, OH (remminger.steven@epa.gov)**TO:**

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D. Bristow, Dayton Regional Haz-Mat Team, Dayton, OH **Non-responsive**

POLREP #: POLREP #2 including the following photos: 1) Perma-Fix conducting second sampling event, 2) Perma-Fix overpacking outside drums, and 3) Hazardous waste loaded for off-site disposal.

II. BACKGROUND

Response Authority: CERCLA Response to an abandoned facility
NPL Status: Non-NPL
Latitude: 39°45'45" N
Longitude: 84°12'65" W
State Notification: Ohio EPA requested U.S. EPA assistance
Start Date: June 6, 2001
Completion Date: August 21, 2001

III. SITE INFORMATION**A. Incident Category**

CERCLA response to an abandoned facility containing hazardous waste drums and containers.

B. Site Description**1. Site location and background**

The Dayton X-Ray site, hereafter referred to as the site, is located at 1150 West Second Street in Dayton, Montgomery County, Ohio. The site is approximately 0.5 miles west of Interstate-75 and one mile from downtown Dayton. The nearest bodies of water are the Great Miami River located a quarter of a mile west of

major municipal well fields. 65 55-gallon drums and containers are located on site. Approximately, 20 of these drums are located outside of the building in close proximity to the sidewalk and pedestrians.

2. Description of threat/Site Inspection

Between June 1994 and May 2000, the City of Dayton Fire Department issued violations to the owner for failure to secure the buildings, improper storage of corrosive liquids, dumped material and abandoned chemical containers causing a fire threat, and failure to apply for chemical storage permits.

On September 21, 2000, pursuant to a search warrant, Ohio EPA entered the site in order to inspect the property and ensure compliance with Ohio's hazardous waste laws. Ohio EPA inspector David Combs photographed site conditions and sampled several drums. Ohio EPA drum sample results indicated the drums contained corrosive, flammable and TCLP lead waste. Ohio EPA also observed several vials containing elemental mercury. Ohio EPA requested U.S. EPA assistance.

On October 31, 2000, START members Brian Kelly and Kelly Greenwell, U.S. EPA OSC Steve Renninger, and ERT health physicist Jerry Gells conducted a site assessment of the site and found drums with flash points of 140°F or less, pH levels of 14.0 (corrosive), pH levels of 1.0 (corrosive), a TCLP lead concentration of 9.7 mg/L, and several containers with the presence of significant concentrations of volatile organics. Additionally, site observations included documentation of poor house keeping, evidence of trespassing, and public access to hazardous waste.

On April 6, 2001, U.S. EPA and the site owner completed an Administrative Order by Consent (AOC) for a Removal Action.

IV. SITE INFORMATION

A. Situation

1. Response activities to date

Between November 2000 and May 2001, the owners of Dayton X-Ray, contracted with Perma-Fix Environmental Services to perform the removal work. Perma-Fix Environmental Services submitted a health and safety plan and a work plan to U.S. EPA which was approved after revisions on April 19, 2001.

On June 4, 2001, a meeting was held at the Perma-Fix facility in Dayton, Ohio. Participants of the meeting included U.S. EPA OSC Steven Renninger, Ohio EPA Dave Combs, Dayton Fire Department (DFD) Andrew Steel, START member Brian Kelly, and Perma-Fix representatives Jack Jaspers and Dan Scroggins. A summary of the meeting is as follows; the DFD has made the appropriate notifications in regards to an emergency contingency plan, Perma-Fix will conduct removal of all containers and spilled materials inside and outside the buildings, Perma-Fix will notify U.S. EPA of the proposed disposal facility prior to shipment, and U.S. EPA will provide oversight, additional air monitoring, and address any resident concerns.

On June 6 and 7, 2001, Perma-Fix was on-site to stabilize and sample wastestreams. A total of 27 drums and containers with varying amounts of liquid and solid hazardous waste were collected, sampled, and staged pending disposal results. 38 containers were staged for labpacking. START conducted continuous air monitoring at the perimeter of the building and found no levels above background.

On June 28 and 29, 2001, Perma-Fix returned to site to conduct level B overpacking of drums and to further investigate a corrosive powders found in the laboratory. During site reconnaissance, four additional drums were located outside of the building and eight drums were found in an adjacent building. Perma-Fix consolidated the drums inside the main Dayton X-Ray building. An investigation of a UST found the tank to be filled with sand.

On August 21, 2001, following receipt of analytical results, approval from the disposal facilities, and U.S.

EPA's verification of disposal facility compliance, Perma-Fix returned to complete waste removal. A total of 76 drums and containers with acetic acid, mercury, caustic solids, MEK, hydrofluoric acid, chromic acid, TCE, nitric acid, poisons, oxidizers, benzene, and other regulated and non-regulated waste were removed. Additionally, the PRP arranged for the removal of empty containers and trash. Ohio EPA Scott Shane was on-site and was briefed by OSC Renninger on the progress of site activities. Following removal of waste, Perma-Fix and the PRP secured the building.

B. Planned Removal Activities

- 1) None. Removal Action Completed.

C. Next Steps

- 1) Perma-Fix will fax copies of manifests to START who will verify waste disposal.

D. Key Issues

- 1) PRPs agreed to perform work and contracted with Perma-Fix Inc (AOC dated 4/6/01).

E. Estimated Costs (Removal)

	CEILING	COSTS TO DATE
U.S. EPA	\$ 5,000	\$ 1,500
START	\$ 17,500	\$ 5,800
Total	\$ 22,500	\$ 7,200

V. WASTE SUMMARY

Waste stream	Quantity	Containment/ Migration Control	Disposal Facility
Flammable liquids	(3) 55-gallon drum	85-gallon overpacks	Perma-Fix of Orlando, Florida & Perma-Fix of Dayton, Ohio
Flammable waste aerosols - Labpack	55-gallon drum	None	Perma-Fix of Orlando, Florida
Toxic Liquids - Labpack	55-gallon drum	None	Perma-Fix of Orlando, Florida
Corrosive Liquids - Labpack	(3) 55-gallon drums (1) 30-gallon drum	None	Perma-Fix of Orlando, Florida
Environmentally hazardous liquid - labpack	55-gallon drum	None	Perma-Fix of Orlando, Florida
Mercury - tubes and thermometers	5 pieces	5-gallon bucket	Perma-Fix of Orlando, Florida
Wastewater, film developer, asphalt materials, oil, and debris	(27) 55-gallon drums	85-gallon overpacks	Perma-Fix of Dayton, Ohio

Sodium Hydroxide	(3) 55-gallon drums	85-gallon overpack	Perma-Fix of Dayton, Ohio
Chromic Acid	10-gallon container	None	Perma-Fix of Dayton, Ohio
Hydroquinone	55-gallon drum	85-gallon overpack	Perma-Fix of Dayton, Ohio
Hazardous Solid Waste	55-gallon drum	85-gallon overpack	Perma-Fix of Dayton, Ohio
Hazardous Liquid Waste	(2) 55-gallon drums	85-gallon overpack	Perma-Fix of Dayton, Ohio
Benzene	55-gallon drum	85-gallon overpack	Perma-Fix of Dayton, Ohio
Toxic Corrosive Liquid	55-gallon drum	85-gallon overpack	Perma-Fix of Dayton, Ohio